

REMARKS**Amendment to the Specification**

Applicant notes that the amendment to paragraph 0021 is prompted by the issuance of a U.S. Patent on the application referenced in paragraph 0021, i.e., Applicant's Atty. Docket No. 10012344-1. Applicant contends that the replacement of the reference to Applicant's Atty. Docket No. 10012344-1 with a reference to U.S. Patent No. 6,826,162 is supported by the Office's PAIR information for U.S. Patent No. 6,826,162. Applicant thus requests entry of the amendment to paragraph 0021.

Rejections Relying on 35 U.S.C. § 102(e)

Applicant notes that the Ogier et al. reference (U.S. Patent No. 6,845,091) used in support of the rejections relies on 35 U.S.C. § 102(e). In responding to the rejections, Applicant does not admit that the reference is prior art and Applicant specifically reserves the right to swear behind this reference at a future date.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-20 were rejected under 35 U.S.C. § 102(e) as being anticipated by Ogier et al. (U.S. Patent No. 6,845,091). Applicant respectfully traverses.

Applicant has expressly stated that mapping information in the context of this Specification pertains to physical network mapping or physical network mapping combined with logical network mapping. *See, e.g.*, Specification, paragraph 0005. As such, Applicant has differentiated itself from systems providing only logical network mapping. Applicant contends that the cited reference does not purport to provide physical mapping information and only purports to provide logical mapping information.

Claims 1-14

Claim 1 recites, in part, "representations of a plurality of network devices depicting locations of the network devices relative to a reference point." Applicant contends that Ogier et al. is directed to logical mapping of a network and, therefore, cannot depict a location of a network device relative to a reference point. Ogier et al.'s network mapping is limited to a logical representation of communication connectivity. *See, e.g.*, Ogier et al., column 6, lines 61-65 ("Each broadcast link connecting multiple nodes 18 is mapped into multiple point-to-

point bi-directional links. For example, a pair of nodes 18 is considered to have established a bi-directional link 18, if each node 18 can reliably receive messages from the other.”); column 7, lines 2-4 (“Nodes 18 that have established a bi-directional link are considered to be adjacent (i.e., neighboring nodes).”). Because Ogier et al.’s mapping is limited to a simple determination of what nodes are capable of bi-directional communication with a given node, Applicant contends that Ogier et al. does not teach or suggest depicting locations of network devices relative to a reference point. All nodes capable of bi-directional communication with a given node are deemed by Ogier et al. to be adjacent the given node regardless of their location. Applicant thus contends that claim 1 is patentably distinct from the cited reference. As claims 2-14 depend from claim 1 and include all patentable limitations of claim 1, these claims are also believed to be allowable. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection, and allowance of claims 1-14.

Claims 15-20

Claim 15 recites, in part, “providing an indication of a distance and a direction to the service-providing device from the service-requesting device using the dynamic mapping information.” The Office Action asserts that Ogier et al. teaches this limitation at column 9, lines 1-14 of the cited reference. Office Action, page 7, second paragraph. Applicant respectfully submits this is a mischaracterization of the reference. Applicant contends that the cited section of the Ogier et al. reference relates to logical mapping techniques and issues, as does the reference as a whole. Applicant thus contends that Ogier et al. does not teach or suggest that it is capable of providing an indication of distance or direction between a service-requesting device and a service-providing device as it only provides information as to the communication connectivity, i.e., what nodes are capable of communicating with what other nodes. Applicant thus contends that claim 15 is patentably distinct from the cited reference. As claims 16-20 depend from claim 15 and include all patentable limitations of claim 15, these claims are also believed to be allowable. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection, and allowance of claims 15-20.

CONCLUSION

Claims 1-20 are pending. Applicant believes that the claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. If the Examiner has any questions regarding this application, please contact the under-signed at (612) 312-2204. No new matter has been added and no additional fee is required by this response.

Respectfully submitted,

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Thomas W. Leffert
Reg. No. 40,697

Attorneys for Applicant
Hewlett-Packard Company
Intellectual Property Administration
P.O. Box 272400
Fort Collins, CO 80527-2400